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December 16, 2019

VIA ELECTRONIC CASE FILING

Honorable Magistrate Judge Sarah Netburn
United States District Court for the
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: In Re: September 11, 2001 Terror Attacks, 03-mdl-1570 (GBD)(SN)
Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(SN)
Bauer et al. v. al Qaeda Islamic Army, et al., 02-cv-7236 (GBD)(SN)

Dear Judge Netburn:

Further to the Court's Order of December 6, 2019 and on behalf of the *Bauer* plaintiffs who are part of the *Ashton* action, enclosed are Default Judgment Orders that we propose to submit in future motions on behalf of additional *Bauer* plaintiffs. These Orders were approved previously by Judge Daniels. They include awards for solatium damages, the conscious pain and suffering of the victims, and estate economic losses.

Our firm anticipates filing approximately 45 motions seeking estate default judgments for economic losses alone, and 2 motions seeking estate default judgments for economic losses and the victim's conscious pain and suffering. In addition, we are preparing a single motion to address solatium damages for a step-daughter of one of the victims who received an original award from the September 11th Victim Compensation Fund.

Should the Court require any additional information, please contact me.

Very truly yours,
Dorothea Capone
Dorothea M. Capone

DMC:cmf
Enclosures

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD) (FM)
ECF Case

This document relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-CV-6977 (GBD)(FM)

AMENDED ORDER OF JUDGMENT

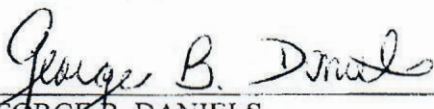
Upon consideration of the evidence and arguments submitted by wrongful death Plaintiffs in the *Ashton* cases referenced above and the Judgment by Default Against the Islamic Republic of Iran entered on 08/26/2015, together with the entire record in this case, it is hereby;

ORDERED that judgment is entered on behalf of all *Ashton* wrongful death Plaintiffs in *Ashton et al. v. Al Qaeda Islamic Army et al.*, 02-CV-6977 (GBD) (FM) for the estates of the decedents identified in the attached Exhibit A against the Islamic Republic of Iran; and it is

ORDERED that the 844 *Ashton* wrongful death estates of the decedents identified in the attached Exhibit A are awarded: (1) compensatory damages for conscious pain and suffering in the amount of \$2,000,000 each for a total of \$1,688,000,000; (2) punitive damages for conscious pain and suffering in the amount of \$6,880,000 each for a total of \$5,806,720,000; and (3) prejudgment interest on the compensatory damages awards for conscious pain and suffering of each decedent to be calculated at the rate of 9% per annum from September 11, 2001 until today.

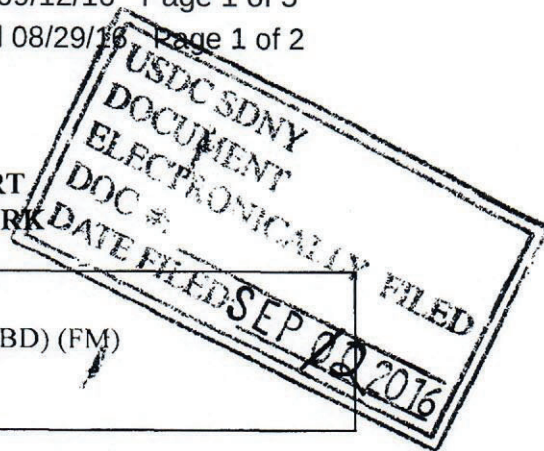
Dated: New York, New York
MAR 03 2016, 2016

SO ORDERED:


GEORGE B. DANIELS
UNITED STATES DISTRICT JUDGE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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This document relates to:

Bauer et al. v. al Qaeda Islamic Army, et al., 02-cv-7236 (GBD)(FM)

ORDER OF FURTHER PARTIAL JUDGMENT

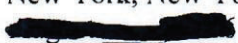
Upon consideration of the evidence and arguments submitted by certain of the *Bauer* wrongful death Plaintiffs in the above-captioned action and the Judgment by Default Against the Islamic Republic of Iran entered on August 26, 2015, together with the entire record in this case, and in addition to the default judgment award for compensatory and punitive damages for the pre-death conscious pain and suffering of each decedent, (*see* ECF Nos. 3226, 3229), it is hereby;

ORDERED that further partial judgment is entered on behalf of those Plaintiffs in *Bauer et al. v. Al Qaeda Islamic Army et al.*, 02-CV-7236 (GBD)(FM) identified in the attached Exhibit A against the Islamic Republic of Iran; and it is

ORDERED that the *Bauer* Plaintiffs identified in the attached Exhibit A are awarded solatium damages as set forth in Exhibit A with prejudgment interest on those awards, to the extent that Plaintiffs' claims arise out of injuries in New York State, to be calculated at the statutory simple interest rate of nine percent per annum from September 11, 2001 until today; and with prejudgment interest on awards arising out of injuries occurring elsewhere, to be calculated at a rate of 4.96 percent per annum, compounded annually, over the same period;


ORDERED that the *Bauer* Plaintiffs identified in the attached Exhibit A are awarded economic damages as set forth in Exhibit A and as supported by the expert reports and analyses submitted in Exhibit B; and

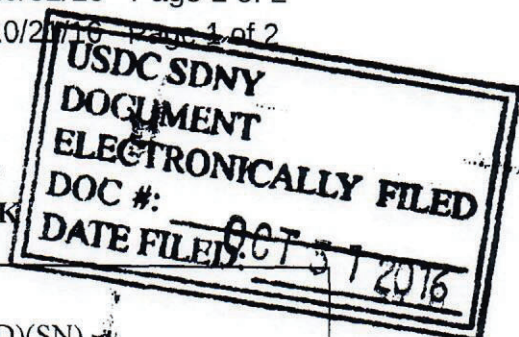
ORDERED that the *Bauer* Plaintiffs not appearing on Exhibit A may submit in later stages applications for solatium and economic damages awards that will be approved on the same basis as currently approved for those Plaintiffs appearing on Exhibit A.

Dated: New York, New York


SO ORDERED:

SEP 02 2016


GEORGE B. DANIELS
UNITED STATES DISTRICT JUDGE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORKIn re Terrorist Attacks on September 11,
200103 MDL 1570 (GBD)(SN)
ECF Case

This document relates to:

Bauer et al. v. al Qaeda Islamic Army, et al., 02-cv-7236 (GBD)(SN)*Ashton et al. v. al Qaeda Islamic Army, et al.*, 02-cv-6977 (GBD)(SN)**[PROPOSED] ORDER OF FURTHER PARTIAL JUDGMENT**

Upon consideration of the evidence and arguments submitted by the forty (40) *Bauer II* and four (4) *Ashton* wrongful death Plaintiffs in the above-captioned actions and the Judgment by Default Against the Islamic Republic of Iran entered on August 31, 2015, together with the entire record in this case, and in addition to the default judgment award for compensatory damages for the pre-death conscious pain and suffering of each decedent, (*see* ECF Nos. 3226, 3229), it is hereby;

ORDERED that further partial judgment is entered on behalf of the forty (40) *Bauer II* and four (4) *Ashton* Plaintiffs identified in Exhibits A and B against the Islamic Republic of Iran; and it is

ORDERED that the forty (40) *Bauer II* and four (4) *Ashton* Plaintiffs identified in the attached Exhibits A and B are awarded solatium damages;

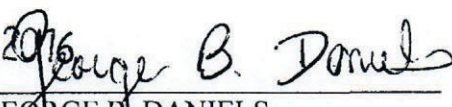
ORDERED that the forty (40) *Bauer II* and four (4) *Ashton* Plaintiffs appearing on Exhibits A and B may submit at a later date (1) an application for punitive damages; (2) an application for economic damages awards that will be approved on the same basis as previously awarded to the *Havlish*, certain of the *Ashton*, and the *Bauer I* Plaintiffs; and (3) Declarations in support of those family members of the decedents in the forty (40) *Bauer II* and four (4) *Ashton*

Plaintiffs who are functionally equivalent to immediate family members.

Dated: New York, New York
October ____, 2016

SO ORDERED:

OCT 31 2016



GEORGE B. DANIELS
UNITED STATES DISTRICT JUDGE